

Exhibit 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

MELINDA SGARIGLIA,)	
)	
Plaintiff,)	
)	
v.)	No. 1:19-cv-05684
)	
AMERICAN INTERNATIONAL RELOCATION)	District Judge Robert M. Dow, Jr.
SERVICES, LLC, D.B.A. AIRES, AN ILLINOIS)	
LIMITED LIABILITY CORPORATION,)	Magistrate Judge Young B. Kim
NICHOLAS GONRING & KELLY GONRING)	
)	
Defendants.)	

**American International Relocation Solutions, LLC's
Answers and Objections to Melinda Sgariglia's First Set of Interrogatories**

Defendant American International Relocation Solutions, LLC ("Aires") presents these
Answers and Objections to Plaintiff Melinda Sgariglia's First Set of Interrogatories.

Preliminary Statement

Aires has not completed its investigation of the facts related to this case, has not completed discovery, and has not completed preparing for any hearing, motion, or trial that might be held in this action. Accordingly, the information disclosed herein represents only that information currently available and known to Aires following a reasonable and diligent investigation in connection with these Answers and Objections. The information disclosed does not preclude Aires from later identifying additional individuals likely to have discoverable information or additional relevant documents pursuant to further investigation or discovery that might be conducted subsequent to the date of these disclosures. Aires reserves the right to supplement or revise these Answers and Objections, as required under federal or local rules or otherwise. Furthermore, nothing Aires discloses in these Answers and Objections shall be deemed to limit Aires's rights to use evidence for purposes of rebuttal or impeachment.

Aires has filed a motion to dismiss Sgariglia's Second Amended Complaint. Nothing disclosed below shall be deemed a waiver of its arguments in its motion to dismiss nor an affirmation that Sgariglia has stated claims against Aires upon which relief can be granted.

Information protected by the attorney-client privilege, work-product privilege, or any other privilege or protection from disclosure established by law will not be produced. Any inadvertent production will not be deemed a waiver of any privilege with respect to the information produced.

INTERROGATORIES

1. Identify the person or people answering the interrogatories, and his or her name, current address, telephone number and occupation. If there is more than one person answering, identify the corresponding numbered paragraphs that each person is answering.

Answer: Elizabeth Boschert, Director, Shared Services, Aires. Ms. Boschert can be contacted through the undersigned counsel.

2. Identify all individuals who performed any work for AIRES as it pertains to the Condominium. Please identify the person's name, last known address, telephone number, email address and the duties of each individual in working on any matter concerning the Condominium.

Answer: Aires objects to this Interrogatory as overly broad, unduly burdensome, and as seeking information not reasonably calculated to lead to the discovery of admissible evidence. Aires further objects on the grounds that the Interrogatory suggests that Plaintiff is seeking information on individuals who were not associated with the sale of the Condominium at issue in this action. Subject to and without waiving these or the general objections, Aires states the following individuals performed work on the sale of the Condominium at issue in this action:

Amanda Flucker. Ms. Flucker is the Policy and Property Consultant who was assigned to work on Mr. Gonring's relocation benefits. Ms. Flucker can be contacted through the undersigned counsel.

Sarah M. Wilkins, Attorney, Terrace Executive Center, 1 South 376 Summit Avenue, Court D, Oakbrook Terrace, Illinois 60161, 630-629-3203. Ms. Wilkins was Aires's legal counsel during the sale of the Condominium.

Garrett Luehrs, Coldwell Banker Residential Brokerage, 1910 N. Clybourn Avenue, Chicago, Illinois 60614, 847-209-0869. Mr. Luehrs acted as Aires's real estate broker.

A representative of Riefberg Real Estate & Relocation Services, 9 Old Sugar Hollow Road, Danbury, Connecticut 06810. Reifberg was retained by Aires to act as closing agent during the sale of the Condominium.

3. Identify all property addresses in Illinois where AIRES acted as the agent for the homeowner since January 1, 2015.

Answer: Aires objects to Interrogatory No. 3 as overly broad, unduly burdensome, not relevant, and not likely to lead to the discovery of admissible evidence.

4. Identify all property addresses in Illinois where AIRES acted as the seller or purchaser of real estate since January 1, 2015.

Answer: Aires objects to Interrogatory No. 4 as overly broad, unduly burdensome, not relevant, and not likely to lead to the discovery of admissible evidence.

5. Identify all Illinois real estate closing attorneys for AIRES from January 1, 2015 to the present. Please provide the attorney's name, last known address and telephone number.

Answer: Aires objects to Interrogatory No. 5 as overly broad, unduly burdensome, not relevant, and not likely to lead to the discovery of admissible evidence.

Dated: June 19, 2020

Respectfully submitted,

American International Relocation Solutions, LLC
Defendant

By: /s/ Arthur J. McColgan
One of Its Attorneys

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